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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CIVIL NO.: 51-CV-1247-GPC-RBB
)	
Plaintiff,)	JOINT MOTION TO EXTEND STAY
)	
RAMONA BAND OF CAHUILLA, CAHUILLA)	
BAND OF INDIANS,)	Date: No hearing date set
)	Time:
Plaintiff-Intervenors,)	Dept: 9
)	
v.)	Hon. Gonzalo P. Curiel
)	
FALLBROOK PUBLIC UTILITY DISTRICT, et al.,)	
)	
Defendants.)	ORAL ARGUMENT NOT REQUIRED
)	
)	

1 Plaintiff-Intervenors Ramona Band of Cahuilla and Cahuilla Band of Indians (“Tribes”)
2 respectfully move this Court for a 90-day extension of the stay of litigation until April 20, 2015, in
3 order to allow the parties to continue settlement discussions. Under this Court’s Order of October
4 21, 2014 (Document 5465), the current stay expires on January 20, 2015. Counsel for the Tribes are
5 authorized to state that the United States, State of California, County of Riverside, Riverside County
6 Flood Control and Water Conservation District, the Greenwald Landowners, Hemet Unified School
7 District, Agri-Empire, and the Anza Basin Landowners Group do not oppose the Tribes’ request to
8 extend the stay for an additional 90 days.

9 With the assistance of U.S. Magistrate Judge Ruben B. Brooks, the negotiating parties
10 continue to make progress toward the goal of an out-of-court resolution of the Tribes’ claims. Since
11 the last status report, the parties have focused their discussions on issues related to the
12 administration of water rights that will be established by the Partial Final Decree implementing the
13 Settlement Agreement, and issues related to the proper management of the groundwater basins to
14 ensure adequate water supplies now and in the future. The parties’ efforts have narrowed the
15 outstanding issues, and all parties are working diligently in good faith to resolve them.

16 Settlement discussions were conducted in person on October 28 at the offices of Richards,
17 Watson & Gershon in Brea, California. On November 17, the counsel for the Tribes and the United
18 States met with Watermaster Charles Binder to discuss particular concerns related to various
19 provisions of the draft settlement agreement. Settlement discussions were conducted by telephone
20 with the larger settlement group on December 18. Counsel for the Tribes and the United States met
21 with representatives of the Anza Landowners Group on December 19 to seek to narrow the
22 remaining issues of concern to them. On January 12, counsel for the Tribes, the United States and
23 the State of California met by telephone to discuss issues unique to the State’s interests and
24 concerns. This process of convening smaller groups focused on issues peculiar to only a few parties
25 has facilitated progress of the negotiations as a whole.

26 U.S. Magistrate Judge Brooks held an in-person settlement conference with the Cahuilla
27 Band of Indians, the United States and Agri-Empire on November 17. Judge Brooks held a
28 telephonic settlement conference with all negotiating parties on November 18. Judge Brooks also

1 held an in-person settlement conference with representatives of the Tribes, the United States and
2 Anza Landowners Group on December 19. A settlement conference with Judge Brooks, the Tribes,
3 the United States, State of California, County of Riverside and Hemet Unified School District is
4 scheduled for January 22, 2015.

5 The parties are committed to continuing these settlement discussions. A 90-day extension of
6 the stay will allow the settlement parties to continue the settlement discussions without the cost or
7 distraction of litigation.

8 For these reasons, the Tribes respectfully request that the stay of litigation be extended to
9 April 20, 2015.

10 Date: January 20, 2015

Respectfully submitted,

11
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